Message

From: Michael Ritorto [mritorto@rouxinc.com]

Sent: 4/4/2018 3:18:08 PM

To: Cirian, Mike [Cirian.Mike@epa.gov]

CC: Andrew Baris [abaris@rouxinc.com]; John.Stroiazzo@glencore.ca; Steve Wright - CFAC [swright@cfaluminum.com];

Gunnar Emilsson [EmilssonGR@cdmsmith.com]; Laura Jensen [ljensen@rouxinc.com]

Subject: RE: Comments to date

Mike,

Thanks for sending. We are going to review internally over the next few days and we'll likely want to set up a conference call late next week to discuss.

We will reach back out after we have had a chance to review.

Thank you.

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From: Cirian, Mike [mailto:Cirian.Mike@epa.gov]

Sent: Wednesday, April 4, 2018 10:59 AM

To: Michael Ritorto <mritorto@rouxinc.com>

Cc: Andrew Baris <abaris@rouxinc.com>; John.Stroiazzo@glencore.ca; Steve Wright - CFAC

<swright@cfaluminum.com>; Gunnar Emilsson <EmilssonGR@cdmsmith.com>

Subject: Comments to date

Hello Michael,

Attached are the comments I have received so far. Below are the comments I received from DEQ. I should be receiving comments from Brian S. and David B. by 4/12/18.

Feel free to call if you have any questions,

Mike

The DEQ has reviewed the Phase II site Characterization Sampling and Analysis Plan, dated February 28, 2918 and the CDM comments, dated April 2, 2028, on the Plan.

The DEQ generally agrees with the CDM comments on the proposed phase II SAP, with the following specific emphasis:

Section 6.3.1, page 40 defined the basis for the RIFS.

The main objectives of phase II are to generate the data needed for the risk assessments and to generate the data for evaluation of remedial action options.

Section 4.2, pages 16-17 well defines the specific tasks involved in phase II.

The extensive RI, phase I data base should allow significant screening of COPCs and COPECs with final screening as part of the risk assessments when the phase II data is available.

It is understood that all monitoring wells (old and New) will be sampled twice as part of phase II. Section 4.6 describes the installation of seven new monitoring wells. The DEQ recommends two additional wells to better define potential impacts on the western residential area (one midway between MW-057 and MW-059 and one 700 feet North of MW-057); the DEQ recommends three additional wells to better define the nature and extent of the cyanide/fluoride plume (one midway between MW-045 and MW-047, one 500 feet West of MW-054, and one 500 feet Northeast of MW-037). Thus 12 new wells (seven recommended by ROUX and five recommended by DEQ) would be installed, developed, and sampled.

Mike Cirian, PE Libby On-site Project Manager US EPA 108 East 9th Street Libby, MT 59923 (406) 293-6194 Office